1 2 3 4 5	Steven S. Kane, Esq., SBN: 061670 Bonnie E. Kane, Esq., SBN: 167700 THE KANE LAW FIRM 402 W. Broadway, Suite 2600 San Diego, CA 92101 Telephone: (619) 236-8700 Facsimile: (619)236-1370 E-mail: skane@thekanelawfirm.com E-mail: bonnie@thekanelawfirm.com		
6	Attorneys for Troy Rogers, Carrie Rogers, and Travis Rogers		
7	UNITED STATES BANKRUPTCY COURT		
8	NORTHERN DISTRICT OF CALIFORNIA		
9	SAN FRANCISCO DIVISION		
10	In re:) Case No	o. 19-30088 (DM)
11	PG&E CORPORATION	Chapter (Lead C	
12	-and-		Administered)
13	PACIFIC GAS AND ELECTRIC		ARATION OF CARRIE ROGERS PORT OF MOTION TO
14	COMPANY Debtors.	ALLOV	W/DEEM TIMELY LATE FILING OOF OF CLAIM
15	□Affects PG&E Corporation) Date:	August 9, 2022
16	☐ Affects Pacific Gas & Electric	Time:	10:00 a.m. To Be Held Telephonically
17	Affects Both Debtors)	United States Bankruptcy Court
18)	Courtroom 17 450 Golden Gate Avenue
19	All papers shall be filed in the Lead Case, No.19-30088 (DM))) , ,	16 th Floor San Francisco, CA
20		Judge:	Honorable Dennis Montali
21	Objection Deadline: August 2, 2022		
22	I, Carrie Rogers, hereby declare and state as follows:		
23	1. This declaration is based upon my personal knowledge unless otherwise indicated. If		
24	called upon to testify as to the matters stated herein, I could and would competently do so.		
25	2. On the day of the Camp Fire I was living at 5086 Foster Road, Paradise, California		
26	95969 with my husband, Troy Rogers, and our adult son Travis Rogers. Another adult son, Ryan		
27	Rogers, stored personal property at our home.		
28	3. My husband and I own our home. Alth	nough our	home is still standing, it suffered some
	II		

Filed: 07/18/22 Entered: 07/18/22 15:45:43 of 2 Doc# 12643-2 Page 1

damage due to the fire. We also lost several outbuildings, such as a chicken coop, barns, and 1 storage sheds, including their contents. 2 4. On the day of the fire, I first reported to work but soon learned that we were to 3 evacuate. I rescued a few items at work upon my boss's request and I then went home to arrange 4 for the evacuation with my husband and sons Travis Rogers and Ryan Rogers. We first had to 5 evacuate my parents and 94-year-old grandfather who lived in upper Paradise. 6 5. Once we were all present at our home, I drove with my parents and grandfather toward 7 Chico. I left my husband and two sons behind so that they could secure our home and follow 8 later. 9 6. It was nearly six hours before we all were able to reconvene at our arranged meeting 10 place in Chico. 11 7. The ordeal was severely distressing to me. My husband and, I as well as our adult 12 sons, lost personal property in the fire, including a 1965 Chevy truck, household appliances and 13 furnishings, clothing, and outdoor lawn and patio furniture, as well as the out-buildings and their 14 contents. 15 8. We did not file a claim earlier because we thought our insurance would compensate us 16 for all our losses, including emotional distress and displacement. However, we now know that 17 our insurance does not cover all of our losses. 18 9. Once I found out that I could request the Bankruptcy Court to allow me to file a late 19 claim for our losses, I contacted counsel immediately and asked them to file a motion for late 20 claim on my behalf. 21 I declare under penalty of perjury under the laws of the State of California and the United 22 States that the foregoing is true and correct. 23 7/17/2022 Executed at Paradise, California, on 24 DocuSigned by: 25 26 Carrie Rogers 27 28